

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-04616-D'ANGELO

UNITED STATES of AMERICA,

Plaintiff,

v.

OREN ALEXANDER,

Defendant.

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**MOTION TO CONTINUE DETENTION HEARING FROM  
MONDAY, DECEMBER 30, 2024 TO FRIDAY, JANUARY 3, 2025**

Oren Alexander, through undersigned counsel, hereby moves to briefly continue his detention hearing for a period of four days from Monday to Friday of next week to permit recently retained counsel to complete preparation for the hearing and to accommodate counsel's need to prepare for and obtain a retinal surgical procedure scheduled for next week. Mr. Alexander states the following grounds in support of this continuance.

Mr. Alexander made his initial appearance on December 20, 2024, and a detention hearing is currently scheduled for December 30, 2024. Since making his initial appearance, Mr. Alexander has made arrangements to retain undersigned counsel to represent him, and undersigned counsel entered his appearance in this matter yesterday.

The instant case presents multiple complex factual and legal issues. Bond

proceedings as to a co-defendant were lengthy and involved detailed financial, biographical, and other matters as to which undersigned counsel has just commenced reviewing to assure that the presentation made on the defendant's behalf is accurate and complete. At the same time, counsel is scheduled for a surgical treatment for retinal problems in the coming week, for which preparation is required and resolution is needed. Counsel has been using steroids to mitigate side effects of the vision problem and will be best able to proceed with the hearing following the scheduled treatment. To assure that the defendant has the benefit of adequate representation at the crucial detention hearing scheduled for next week, we request a brief continuance of four days, to Friday, January 3, 2025..

Independently of counsel's recent bout with retinal and related issues, counsel has identified specific needs for additional investigation and record preparation anticipatory to the detention hearing. The facts are complex, and it will take time to reach out to witnesses, research the relevant factual and legal issues, and gather evidence to present to the Court.

Mr. Alexander is thus requesting a brief continuance of his detention hearing to Friday, Jan. 3, 2025. Undersigned counsel conferred with counsel for the government. Assistant United States Attorney Kaiya Orroyo represented that the government does not oppose the continuance, provided that Mr. Oren Alexander agrees to accept the testimony of the agents at Tal and Alon Alexander's hearings, given the resources required to transport an agent to the Southern District of Florida. Oren Alexander agrees to this modification and requests the continuance pursuant to this agreement.

WHEREFORE, the defendant, Oren Alexander, hereby requests that his detention hearing be continued to Friday, Jan. 3, 2025.

Respectfully submitted,

KLUGH WILSON LLC

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